UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ELECTRONIC MAIL

February 5, 2014

Mr. John Garges
Project Coordinator
Conestoga-Rovers & Associates
410 Eagleview Blvd., Suite 110
Exton, PA 19341

RE: North Penn 5 Superfund Site, Operable Unit 2
Report of Findings, dated November 20, 2013

Dear Mr. Garges:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the above-referenced report. Thank you for sharing this information. As you know, your client is performing this work voluntarily, that is, not subject to an order issued by or agreement with EPA. The work performed by ABB, Inc. provides some helpful information for determining if contamination at the property warrants further investigations or actions. However, as was discussed during our January 28, 2014 conference call, further information is necessary to determine whether 1,1,1-Trichloroethane (1,1,1-TCA) exists at elevated levels on the Powertest Property, located at 4379 County Line Road, Chalfont, PA 18914:

1. Figure 1 identifies three locations identified as PTGP-19. True locations were clarified during the January 28 call.

2. Figure 1 shows the newly installed well MW-05S/D in a location presumably upgradient of the previously installed MW-02.

3. Page 11 states that there do not appear to be any current 1,1,1 TCA or other VOC impacts in the soil or groundwater. However, both 1,4-dioxane (an additive and associated compound of 1,1,1-TCA) and 1,1-dichloroethene (1,1-DCE) (the hydrolysis product of 1,1,1-TCA) were found at low concentrations in the groundwater. The presence of these compounds, even in small amounts, would indicate the presence of 1,1,1-TCA, given that 1,4-dioxane is a conservative chemical (flows with groundwater and is not attenuated) and 1,1-DCE is a reaction product of 1,1,1-TCA in water.

4. Well Logs show five locations (PTGP-13, PTGP-14, PTGP-15, PTGP-16 and PTGP-17) with much higher PID readings than the other eleven Geoprobe points. PID Readings were as high as 69 (presumably ppm). There is no discussion of this finding in the text.

5. Low Flow Sampling Data Sheet. Well MW-05S had an unusually high pH. No explanation was provided. Well MW-05S also showed increasing turbidity with purging; indicating that parameter stabilization did not occur prior to sampling. Low flow sampling is not appropriate if the stabilization parameters do not stabilize prior to sampling. The groundwater sampling may have been affected by well completion and development and/or a more permeable feature in the filter pack rather than the formation. Thus, in bedrock wells, it is recommended that purging is at a rate slightly less than the yield and that three well volumes are removed to ensure a representative sample of the groundwater.

Given the upgradient location of the newly installed well, the use of the low flow sampling method without parameter stabilization, and the detections of two compounds associated with 1,1,1-TCA, along with the potential for contamination indicated by the high PID readings at the geoprobe locations on the apparent downgradient side of the building, the data do not fully support the Section 4 Conclusions presented. It is recommended that an additional well be installed at a location on the western side of the building, in a location near to and downgradient of the abandoned well MW-02. In the event an additional well cannot be physically installed downgradient of the abandoned well MW-02, EPA would ask for documentation of the infeasibility of drilling a downgradient well. Further, if it is infeasible to install a well downgradient of the former MW-02 location, EPA would recommend that MW-05 be redeveloped and that a pump test of limited duration with time-series sampling be performed using MW-05.

EPA encourages ABB, Inc. to enter into an agreement with EPA for future performance of work at the Powertest property, so that EPA approval and oversight can limit any future need to remobilize. Please contact me at (215) 814-3018 if you wish to discuss this matter, or have your attorney contact Allison Gardner at (215) 814-2631.

Sincerely,

Sharon Fang, P.E.
Remedial Project Manager

cc: Peter Knight, Esq.
Dennis Kutz, PADEP
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